

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
GREENEVILLE DIVISION**

B.P., et al.,

Plaintiffs,

v.

No: 2:23-cv-00071-TRM-JEM

CITY OF JOHNSON CITY, TENNESSEE, et al.,

Defendants.

**DECLARATION OF VANESSA BAER-JONES IN SUPPORT OF PLAINTIFFS’
REPLY IN SUPPORT OF PLAINTIFFS’ UNOPPOSED MOTION TO DISMISS
TO THE COURT AND ITS ATTORNEYS OF RECORD:**

I, Vanessa Baehr-Jones, declare under penalty of perjury under the laws of the United States that the foregoing is true and correct:

1. I am over twenty-one years of age and am competent in all respects to give this Declaration. This Declaration is given freely and voluntarily. I have personal knowledge of the matters herein and could, and would, testify competently thereto under penalty of perjury.
2. I am lead counsel for Plaintiffs B.P., et al., in the above-referenced case. I am a licensed attorney in good standing in the State of California (CABN 281715) and admitted to appear *pro hac vice* in this District.
3. On February 15, 2025 (a Saturday), Plaintiffs’ counsel received an email from Rory Weeks, counsel for C.S. Mr. Weeks asked a number of questions which concerned confidential settlement agreements between Plaintiffs’ counsel’s clients, survivors of Sean Williams, and Johnson City. Mr. Weeks provided his cellphone number and

asked Plaintiffs' counsel to call him back over the holiday weekend (Monday was a federal holiday).

4. On February 17, 2025, Plaintiffs' counsel replied and indicated they were unavailable over the holiday weekend and asked for Mr. Weeks' availability the following week. Mr. Weeks indicated that he would not wait to speak with Plaintiffs' counsel.

Respectfully submitted this 24th day of February 2025,

/s/ Vanessa Baehr-Jones
Vanessa Baehr-Jones

CERTIFICATE OF SERVICE

I HEREBY certify that a copy of the foregoing has been filed and served via the court's electronic filing system on February 24, 2025, to counsel of record:

<p>K. Erickson Herrin HERRIN, McPEAK & ASSOCIATES 515 East Unaka Avenue P. O. Box 629 Johnson City, TN 37605-0629 rachel@hbm-lawfirm.com</p> <p>Emily C. Taylor Maria Ashburn WATSON, ROACH, BATSON & LAUDERBACK, P.L.C. P.O. Box 131 Knoxville, TN 37901-0131 etaylor@watsonroach.com mashburn@watsonroach.com</p> <p><i>Attorneys to Defendants, Johnson City, Tennessee, Karl Turner, in his individual and official capacities, and Investigator Toma Sparks, in his official capacity</i></p> <p>Jonathan P. Lakey Burch, Porter, & Johnson, PLLC 130 N. Court Ave. Memphis, TN 38103 901-524-5000 jlakey@bpjlaw.com mchrisman@bpjlaw.com</p> <p><i>Attorney to Defendant City of Johnson City, Tennessee</i></p>	<p>Kristin Ellis Berexa Ben C. Allen FARRAR BATES BEREXA 12 Cadillac Drive, Suite 480 Brentwood, TN 37027-5366 kberexa@fbb.law ballen@fbb.law jdowd@fbb.law msutton@fbb.law gpatton@fbb.law</p> <p><i>Counsel for Toma Sparks in his individual Capacity</i></p> <p>Keith H. Grant Laura Beth Rufolo Robinson, Smith & Wells, PLLC 633 Chestnut Street, Suite 700 Chattanooga, TN 37450 kgrant@rswlaw.com lrufolo@rswlaw.com awells@rswlaw.com</p> <p><i>Counsel for Justin Jenkins and Jeff Legault in their individual capacity</i></p> <p>Daniel H. Rader IV MOORE, RADER & YORK PC 46 North Jefferson Avenue P. O. Box 3347 Cookeville, TN 38501 danny@moorerader.com</p> <p><i>Counsel for Defendant Karl Turner in his individual Capacity</i></p>
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/s/ Vanessa Baehr-Jones
Vanessa Baehr-Jones